

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
_____)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

Suits Naming the Tennessee Clinic)
Defendants)
_____)

**NOTICE OF FILING OF SUBPOENAS
AND DEPOSITION NOTICES**

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively “Tennessee Clinic Defendants”) give notice to the Court and to all parties, pursuant to Federal Rules of Civil Procedure 45(a)(4) and 30, of the issuance, service, and filing of the following:

1. Subpoena to New England Compounding Center and FRCP 30(b)(6) Notice of Deposition of New England Compounding Center and *duces tecum*¹
2. FRCP 30(b)(6) Notice of Deposition of Medical Sales Management, Inc.²
3. Subpoena to Francis McAteer and Notice of Deposition of Francis McAteer³
4. Subpoena to John Notarianni and Notice of Deposition of John Notarianni.⁴

¹ Exhibit 1.

² Exhibit 2.

³ Exhibit 3.

⁴ Exhibit 4.

The subpoenas and notices are being emailed and/or mailed for service to (1) the deponents or their counsel and (2) directly-involved counsel today. This Notice is filed in the main docket to ensure each party has notice of the subpoenas and notices.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

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***Attorneys for the Tennessee Clinic
Defendants***

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 17th day of April, 2015.

/s/ Chris J. Tardio

Chris J. Tardio